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MEMO ENDORSED

June 14, 2007

VIA ECF & OVERNIGHT MAIL
Hon. Mark D. Fox
United States Magistrate Judge
U.S. District Court for the Southern District of New York
United States Courthouse
300 Quarropas St., Room 434
White Plains, NY 10601

Re: Matter: Linda O'Sullivan f/k/a Linda Boese v. Ramapo Practice
                        Management, LLC
        Venue: United States District Court, Southern District of New York
        Case No.:   Case No. 7:07-cv-03456-UA-(MDF)
        Our File No.:   03001.06524

Dear Justice Fox:

Please be advised, we represent the defendant Ramapo Practice Management, LLC in the above-referenced action. On June 13, 2007, in accordance with Your Honor's individual rules of practice, we submitted a letter on behalf of Ramapo, requesting a pre-motion conference in anticipation of Ramapo's motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6).

We received a telephone call earlier today from Your Honor's chambers informing us that Your Honor will decide whether Ramapo may proceed with its motion at a conference with plaintiff's counsel on July 10, 2007 at 8:55 am. Pursuant to a Stipulation and Order signed by Your Honor on May 18, 2007 Ramapo has until June 28, 2007 to appear, answer, or otherwise respond to plaintiff's complaint, by filing a motion to dismiss. Therefore, since the conference on July 10, 2007 is to discuss whether a motion to dismiss is appropriate, Ramapo hereby requests that its time to respond to the plaintiff's complaint be tolled until such time as Your Honor decides whether Ramapo may proceed with its motion to dismiss.

MARK D. FOX
United States Magistrate Judge
Southern District of New York

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     Should Your Honor decide that an answer is appropriate, we request 30 days after the conference to file same. If we are permitted to proceed with a motion we would like to establish a 60 day briefing schedule with plaintiff's counsel that we can submit at Your Honor's convenience. Thank You

                  Very truly yours,

                  Michael Adler
                  (MA 5498)

cc: Vanessa R. Elliott, Esq. (Via ECF and Overnight Mail)

WINGET, SPADAFORA & SCHWARTZBERG, LLP